

***IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK***

ALPHONSO DAVID,

Plaintiff,

Civil Action No. 1:22-CV-00620

V.

**THE HUMAN RIGHTS CAMPAIGN AND
THE HUMAN RIGHTS CAMPAIGN
FOUNDATION,**

Defendants.

INITIAL CONFERENCE QUESTIONNAIRE

Plaintiff Alphonso (“**Plaintiff**” or “**Mr. David**”) and The Human Rights Campaign (“**HRC**”) and The Human Rights Campaign Foundation (“**HRCF**”) (“HRC” and “HRCF” are sometimes collectively referred to as “**HRC**” or the “**Organization**”) file this Initial Conference Questionnaire pursuant to Judge Mann’s Order, dated March 23, 2022 (Dkt. No. 24):

1. Have the parties exchanged the automatic disclosures required by Fed. R. Civ. P. 26(a)(1)? **The parties will exchange automatic disclosures on or before April 26, 2022, that is, at least two days prior to the Rule 26(f) conference scheduled for April 28, 2022.**
2. If additional interrogatories beyond the 25 permitted under Fed. R. Civ. P. 33(a) are needed, the maximum *additional* ones by: plaintiff **0** and defendants **0**
3. Maximum number of requests for admission by: plaintiff **15** and defendants **15**
4. Number of depositions by plaintiff of: parties **5** non-parties **5**
5. Number of depositions by defendants of: parties **1** non-parties **5**

6. Time limit per deposition (if more than 7 hours permitted by Fed. R. Civ. P. 30(d)(1) is required): 7 hours

7. Date for completion of factual discovery: December 15, 2022

8. Number of expert witnesses of plaintiff: 1 medical 2 non-medical

Date for expert disclosure, including report(s): March 15, 2023

9. Number of expert witnesses of defendants: 1 (rebuttal) medical 2 (rebuttal) non-medical

Date for rebuttal expert disclosure, including report(s): May 15, 2023

10. Dates for completion of expert depositions (if desired): June 30, 2023

11. Time for amendment of the pleadings by plaintiff and by defendant(s): November 1, 2022

12. Number of proposed additional parties to be joined by plaintiff 0 and by defendants 0 and time for adding those parties: N/A

13. Types of contemplated dispositive motions: motion for summary judgment pursuant to Fed. R. Civ. P. 56.

14. Dates for filing contemplated dispositive motions, or where applicable, requests for a premotion conference: Requests for a premotion conference for a motion for summary judgment to be made within 30 days of the certification of the close of discovery.

15. Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference. Yes, parties intend to enter into a standard ESI protocol

16. Do the parties' consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(d) (Answer "no" if any party declines to consent, without indicating which party has declined.)
No

Dated: April 26, 2022.

Respectfully submitted,

STOWELL & FRIEDMAN LTD.

/s/ Linda D. Friedman

Linda D. Friedman
Shona B. Glink
Jared A. Calvert
303 W. Madison, Suite 2600
Chicago, IL 60606
Phone: (312) 431-0888
lfriedman@sfltd.com
sglink@sfltd.com
jcalvert@sfltd.com

Matthew J. Singer
MATT SINGER LAW, LLC
77 W. Wacker, Suite 4500
Chicago, IL 60601
Phone: (312) 248-9123
Matt@MattSinglerLaw.com
Attorneys for Plaintiff

DLA PIPER LLP (US)

/s/ Kim J. Askew

Kim J. Askew, Esq.
(admitted *pro hac vice*)
Kim.Askew@us.dlapiper.com
Maria A. Garrett, Esq.
(admitted *pro hac vice*)
Maria.Garrett@us.dlapiper.com
1900 North Pearl Street, Suite 2200
Dallas, Texas 75201
Telephone: (214) 743-4500
Facsimile: (214) 743-4545

Brian S. Kaplan, Esq.
Brian.Kaplan@dlapiper.com
Evan D. Parness, Esq.
Evan.Parness@dlapiper.com
Cherelle I. Glimp, Esq.
Cherelle.Glimp@dlapiper.com
1251 Avenue of the Americas
New York, New York 10020
Phone: (212) 335-4500
Fax: (212) 335-4501

*Attorneys for Defendants
The Human Rights Campaign and
The Human Rights Campaign Foundation*

CERTIFICATE OF SERVICE

This certifies that, on April 26, 2022, the undersigned filed the foregoing electronically. Notice of this filing will be sent by e-mail to all counsel of record by operation of the Court's electronic filing system.

/s/ Brian S. Kaplan
Brian S. Kaplan, Esq.